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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

ROBERT COACHE, An Individual,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, CLARK COUNTY,
MARC DIGIACOMO, COLIN HAYNES,
NATHAN CHIO, and DOES 1-30,

Defendants.

Case No.: 2:21-cv-01334-RFB-BNW

**JOINT MOTION TO EXTEND TIME
FOR PLAINTIFF TO FILE AND
SERVE OPPOSITION TO MOTION TO
DISMISS**

[FIRST REQUEST]

Plaintiff Robert Coache ("Plaintiff"), by and through his counsel Ralph A Schwartz, PC, and Brown, Clark, Le, Stedman & Cevallos LLP, and Defendants Clark County, Las Vegas Metropolitan Police Department, Colin Haynes, and Lt. Nathan Chio ("Defendants"), by and through their counsel, Lyssa S. Anderson Esq., and Kaempfer Crowell, submit this

MOTION TO CONTINUE TIME TO FILE OPPOSITION TO MOTION TO DISMISS

3 Defendants filed and served their Motion to Dismiss on December 6, 2021. The current
4 deadline for Plaintiff to file the opposition to the Motion is December 20, 2021. Plaintiff requests an
5 additional thirty (30) days to file his opposition to the Motion to Dismiss. The requested extension is
6 needed to ensure that Plaintiff has adequate time to adequately respond to the Motion to Dismiss. The
7 extension is also needed due to the upcoming holidays. The requested extension is made in good faith
8 and not for the purpose of delay. This is Plaintiff's first request for an extension to oppose the Motion
9 to Dismiss. The new date for the filing and serving of the opposition would be January 20, 2022.
10

Dated: December 7, 2021

By: /s/ Ralph A. Schwartz, Esq.

Ralph A Schwartz
Counsel for Plaintiff Robert Coache

17 Dated: December 7, 2021

KAEMPFER CROWELL

By: /s/ Lyssa Anderson, Esq.

Lyssa Anderson
Counsel for Defendants Las Vegas
Metropolitan Police Department, Colin
Haynes, and Lt. Nathan Chio

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

DATED: December 20, 2021

MOTION TO CONTINUE TIME TO FILE OPPOSITION TO MOTION TO DISMISS